

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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DEJA BARBOUR, SHINNEL GONZALEZ,	)	
and RAKAYYAH MASSEY,	)	
	)	
Plaintiffs,	)	
	)	
-against-	)	
	)	<b>07 Civ. 3014 (RPP)</b>
THE CITY OF WHITE PLAINS, et al.,	)	
	)	
Defendants.	)	
-----X		

**NOTICE OF MOTION FOR ATTORNEYS' FEES AND COSTS**

PLEASE TAKE NOTICE that, upon the accompanying Declarations of Michael L. Spiegel and Scott A. Korenbaum, the exhibits annexed thereto, and the accompanying Memorandum of Law, and upon all the prior pleadings and proceedings herein, plaintiffs move this Court, at the Courthouse located at 500 Pearl Street, New York, New York, at a date and time to be selected by the Court, for an order awarding attorneys' fees and other discretionary costs to plaintiffs in the total amount of \$280,940.44, pursuant to Rule 54 (d) of the Federal Rules of Civil Procedure and 42 U.S.C. § 1988, as follows:

- a. Attorney's fee of Michael L. Spiegel in the amount of \$205,375.00; and
- b. Attorney's fee of Scott A. Korenbaum in the amount of \$61,920.00; and
- c. Paralegal costs in the amount of \$8,712.50; and
- d. Expenses in the amount of \$4,932.94; and
- e. such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b) of the

Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposition papers are to be served within ten business days after service of these motion papers.

Dated: New York, New York  
March 14, 2011

MICHAEL L. SPIEGEL, ESQ.  
SCOTT A. KORENBAUM, ESQ.  
111 Broadway, Suite 1305  
New York, NY 10006  
(212)587-8558

By: \_\_\_\_\_ s/\_\_\_\_\_  
Michael L. Spiegel

To: Joseph A. Maria, P.C.  
Attorney for Defendants  
301 Old Tarrytown Rd.  
White Plains, NY 10603